

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CAREFREE PARK CORPORATION, AMIN
NABHAN and JAMILE NABHAN,

Plaintiffs,

v.

ADIB NABHAN,

Defendant.

Civil Action No. 2003-CV-12426 RCL

**JOINT MOTION FOR LEAVE TO FILE PRETRIAL MEMORANDUM
THREE DAYS PRIOR TO PRETRIAL CONFERENCE**

The parties in the above-captioned action hereby request leave of the Court to file their Joint Pretrial Memorandum on November 14, 2005, three days prior to the Pretrial conference scheduled for November 17, 2005. In support of their motion, the parties state that they have been engaged in the completion of discovery in this matter and have also been engaged in settlement discussions, including attempting to resolve the matter through mediation. Those factors prompted the parties jointly to move for a continuation of the Pretrial Conference. When that motion was denied on Wednesday, November 9, 2005, the schedules of the parties' counsel prevented them from meeting to discuss the Pretrial Memorandum and other issues pertaining to the trial of the action until Friday, November 11, 2005 and made filing of the memorandum prior to November 14, 2005 impossible. In further support of their motion, the parties state that allowing their motion to file the Pretrial Memorandum on November 14, 2005 will not delay either the date of the Pretrial Conference or the trial itself.

WHEREFORE, the parties ask that their Joint Motion To File Pretrial Memorandum Three Days Prior To Pretrial Conference be allowed.

ADIB NABHAN,

CAREFREE PARK CORPORATION

By his attorney,

By its attorneys,

/s/ Doyle C. Valley

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Dated: November 14, 2005

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon the attorney of record for each other party by hand on November 14, 2005.

/s/ G. Jones

Gordon M. Jones, III